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**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

1 Nicole Newman, Individually and on  
2 Behalf of All Others Similarly Situated,

3 Plaintiffs,

4 v.

5 Americredit Financial Services, Inc.,

6 Defendant.

7 **Case Number:** 11-CV-3041 DMS(BLM)

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**NOTICE OF SETTLEMENT AND  
JOINT MOTION TO VACATE ALL  
CASE DEADLINES OCCURRING  
PRIOR TO THE MOTION FOR  
PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT  
HEARING**

On August 15, 2012, and then again on August 27, 2012, the Parties participated in two all-day mediation sessions before Judge Leo S. Papas (Ret.). As a result of these two mediations a joint settlement, on a class-wide basis, has been reached in this action and another action pending in the Northern District of Illinois, entitled *Mack v. General Motors Financial Co., Inc.*, 11-CV-9008. The Parties are currently working in good faith to prepare the necessary settlement documents. Plaintiff anticipates finalizing all necessary settlement documents and filing her Motion for Preliminary Approval within roughly 60 days, by October 30, 2012. In anticipation of a hearing date on the Motion for Preliminary Approval within four weeks of October 30, 2012, the Parties respectfully request that the Court vacate all pending case deadlines occurring before October 30, 2012. Specifically, these pending case deadlines are as follows:

**August 31, 2012:** Expert exchange;

**September 14, 2012:** Plaintiff's motion for class certification;

## September 21, 2012: Supplemental expert exchange;

## **October 26, 2012: Expert disclosures.**

Respectfully submitted,

August 28, 2012

Hyde & Swigart

By: /s Joshua B. Swigart  
Joshua B. Swigart  
Attorneys for Plaintiffs

August 28, 2012

**Goodwin Procter, LLP**

By: /s Chad R. Fuller  
Chad R. Fuller  
Attorneys for Defendant

1 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and  
2 Procedures Manual, I hereby certify that the content of this document is acceptable to Chad R.  
3 Fuller, counsel for Defendant, and that I have obtained Mr. Fuller's authorization to affix his  
4 electronic signature to this document.

5  
6 Dated: August 28, 2012

**HYDE & SWIGART**

7 s/Joshua B. Swigart  
8 Joshua B. Swigart  
9 Attorneys for the Plaintiff

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